

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:22CR191
	§	Judge Jordan
RICHARD WAYNE SMITH	§	

**GOVERNMENT’S MOTION FOR LEAVE TO FILE  
MOTIONS FOR LIMITED UNSEALING AND A PROTECTIVE  
ORDER UNDER SEAL**

The United States, by and through the undersigned Assistant United States Attorney, respectfully requests leave to file under seal the government’s Motions for Limited Unsealing and a Protective Order as certain discovery materials and the search warrants contain sensitive, identifying information about child victims and child witnesses, as defined by 18 U.S.C. § 3509(a)(3). The discovery will also contain information about sensitive law enforcement techniques. Accordingly, the undersigned seeks permission to file the Motions under seal.

**CONCLUSION**

Based on the foregoing, counsel for the United States requests that this Court grant the government’s Motion for Leave to File its Motions for Limited Unsealing and a Protective Order for under seal.

Respectfully submitted,

BRIT FEATHERSTON  
UNITED STATES ATTORNEY

/s/\_\_\_\_\_  
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**CERTIFICATE OF CONFERENCE**

I certify that I conferred with Brian O'Shea, Esq., counsel for defendant Richard Wayne Smith, and the defense agrees to this motion.

/s/\_\_\_\_\_  
Marisa J. Miller

**CERTIFICATE OF SERVICE**

I certify a true and correct copy of the Motion for Leave to File Motions for Limited Unsealing and a Protective Order under seal was served by electronic filing to counsel of record on this 11th day of August, 2022.

/s/\_\_\_\_\_  
Marisa J. Miller